

Source: Email string between lead auditor Kyle Rossi and Amanda Borup, Marijuana Policy Analyst at OLCC.

Purpose: Support report language and audit conclusion that OLCC security regulations are not based on science or a risk-assessment but on what other states were doing at the time along with what the industry, OLCC and law enforcement felt was appropriate.

Archived: Friday, January 13, 2023 9:25:28 AM
From: [BORUP Amanda * OLCC](#)
Sent: Friday, January 13, 2023 9:24:50 AM
To: [ROSSI Kyle A * SOS](#)
Cc: [Jurik Andrew * OLCC](#); [HAHN Hillary * SOS](#); [BARRETT Nicole * SOS](#)
Subject: RE: Update and a Request for Information
Sensitivity: Normal

R1

R3

It think it is a mix, I know a lot of the security requirements discussed were almost like “best practices” from WA and CO, and also later medical states. At that time the cole memo was really a driving force for both adult use and new medical. I am really not aware of any studies for security of cannabis operations, largely because most of them were illegal or semi legal, and probably had other types of security (like traps/trip wires/guns). Also, adult use changed the scale of the growing (for example), it wasn’t growing for a few patients in your garage, it was massive indoor and outdoor grows.

Based on my memory, I think the industry wanted to pick and choose security based on what they felt like they needed, which is why we came up with the waiver. Also around that time the industry got the address exemption in statute, because of concerns about people knowing their location and robbing them, so security was a real concern for both the agency and the industry. Ultimately the security requirements were an OLCC decision, but we did make concessions based on what the industry wanted. I probably should mention too – on the 2015 RACS we also had state and local law enforcement participation, so it wasn’t just the OLCC and the industry, there were public safety professionals in the conversations as well.

Happy to have a TEAMS call to discuss further.

R2

From: ROSSI Kyle A * SOS
Sent: Friday, January 13, 2023 8:57 AM
To: BORUP Amanda * OLCC <Amanda.Borup@oregon.gov>
Cc: Jurik Andrew * OLCC <Andrew.Jurik@oregon.gov>; HAHN Hillary * SOS <Hillary.Hahn@sos.oregon.gov>; BARRETT Nicole * SOS <Nicole.BARRETT@sos.oregon.gov>
Subject: RE: Update and a Request for Information

That context is helpful, but I have some questions and I don’t want to draw a conclusion that isn’t there.

I read the first part of your response as the rule committee meetings and the associated group discussions are how the current security rules were established. If that is the case, was it that group that decided steel doors, alarms, and video were the best standards or was there some sort of risk-assessment, study, or something else that showed OLCC these measures are the best ones to provide the security decided and/or reduce the risk of diversion?

Let me know if a teams call would be easier.

Kyle

From: BORUP Amanda * OLCC <Amanda.Borup@oregon.gov>
Sent: Friday, January 13, 2023 8:26 AM
To: ROSSI Kyle A * SOS <Kyle.A.ROSSI@sos.oregon.gov>
Cc: Jurik Andrew * OLCC <Andrew.Jurik@oregon.gov>; HAHN Hillary * SOS <Hillary.Hahn@sos.oregon.gov>; BARRETT Nicole * SOS <Nicole.BARRETT@sos.oregon.gov>
Subject: RE: Update and a Request for Information

Hi Kyle,
Good question. In the summer of 2015 we had the elaborate rule committees, and we discussed security with all of the

different license type groups. All thought security would be important, with varying ideas of how that could be accomplished. To meet in the middle we established a security plan and security waiver in rule:

Plan: https://secure.sos.state.or.us/oard/viewSingleRule.action;JSESSIONID_OARD=ByKr6PVPXTU5CfluWBBuWXGIR-TI-yl7iiLX36gloQirldPkslzV!857461650?ruleVrsnRsn=296259

Waiver:
https://secure.sos.state.or.us/oard/viewSingleRule.action;JSESSIONID_OARD=ByKr6PVPXTU5CfluWBBuWXGIR-TI-yl7iiLX36gloQirldPkslzV!857461650?ruleVrsnRsn=287742

This way if licensees could show they had adequate security they could still be licensed without meeting all of the security requirements in rule.

For camera coverage, the industry very much wanted it to be motion detection, and there will be a bill in 2023 attempting to add that language to statute. During the 2015 process the commission was presented with many ways motion detection can be altered, and decided to require full coverage to assist in investigations, both for OLCC and for when the licensees are robbed or burglarized. The reason for the off-site back-up is normally when someone breaks into a facility with back up on site it is the first thing they destroy.

Hope that is helpful, let me know if you have any follow up question,
Amanda

From: ROSSI Kyle A * SOS

Sent: Friday, January 13, 2023 8:02 AM

To: BORUP Amanda * OLCC <Amanda.Borup@oregon.gov>

Cc: Jurik Andrew * OLCC <Andrew.Jurik@oregon.gov>; HAHN Hillary * SOS <Hillary.Hahn@sos.oregon.gov>; BARRETT Nicole * SOS <Nicole.BARRETT@sos.oregon.gov>

Subject: Update and a Request for Information

Hi Amanda,

I have a quick update, we're in the midst of our quality control process and anticipate having a draft to send before the end of January.

As we're working through the QC process, an interesting question arose and I'm wondering if you can provide some insight. Regarding some of the regulatory requirements for licensees – specifically things like steel doors/steel frames and video surveillance, etc. what was the origination of these regulations?

In other words, how did OLCC determine these are the regulations to use? Is there a formal risk assessment or research OLCC used, or did it adopt what Colorado and Washington were using?

Thanks,



Kyle Rossi

Principal Auditor

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